

## REMARKS

All of the claims have been amended to call for a coset selector.

The claims based on a coset selector were not rejected over the prior art.

A coset selector in general is known in the art. For example, the book *Trellis and Turbo Coding* by Christian Schlegel and Lance Perez at page 71 describes a coset selector. This book was published by the Wiley-IEEE Press in a first edition on May 14, 2003. Page 71 and Figure 3.16 show a generic trellis encoder block diagram with lattice notation showing a coset selector. It is explained that trellis code breaks into two components. The first is called the coset code and is made up of a finite state machine and mapping into cosets of suitable lattice partition  $A/A'$ . The second part is the choice of the actual signal point within the chosen coset. This signal choice determines the constellation boundary and therefore shapes the signal set and is referred to as shaping.

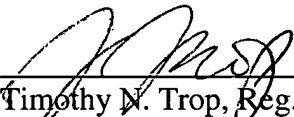
Thus, it is respectfully submitted that one skilled in the art would be aware of a coset selector or a coset selector circuit. But the use of a coset selector circuit receives successive constellation indices from the index mapper to determine a number of nearest cosets to selective constellation indices is not taught. Likewise, with respect to amended claim 10, determining at least four nearest code sets to successive constellation indices is not taught. Likewise, the limitations added to claim 16 are not taught. Similarly, the limitations added to claim 20 are not taught.

In other words, the concept of a coset selector and how to do it was well known to one skilled in the art at the time the present application was filed. The specific way a coset selector is used or the specific way that cosets are selected as set forth in the claims is not known.

Therefore, reconsideration is respectfully requested.

Respectfully submitted,

Date: January 8, 2008

  
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Timothy N. Trop, Reg. No. 28,994  
TROP, PRUNER & HU, P.C.  
1616 South Voss Road, Suite 750  
Houston, TX 77057-2631  
713/468-8880 [Phone]  
713/468-8883 [Fax]